

Redacted



4840 VENTURE DRIVE
ANN ARBOR, MI 48108
PHONE: (800) 930-5450
FAX: (800) 930-5479

To: Qualice, LLC
11 E. V. Hogan Drive
Hamlet, NC
28345

December 19, 2014

RE: Analysis of CBI - 1

Thank you for contacting Avomeen regarding the analysis of Qualice chlorinated paraffin samples at the CBI - 2 levels in accordance with questions presented by EPA under the Qualice consent order. Specifically, EPA has asked for a determination of the chain lengths and the % chlorination in the two samples provided by Qualice.

We received samples from Qualice in which the feedstock that we analyzed earlier had been chlorinated to the CBI - 3 levels.

CBI - 4



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There may have been some possible, less than complete chlorinated portions in the product. We did not evaluate these peaks as this was not part of our analysis.

CBI - 5

We believe our methodology and calculations are suitable to fully characterize the chlorinated paraffin oils and answer the questions brought forth by the EPA regarding the Ricerca methodology.

All data provided in this report were reviewed and accepted by our QA department prior to issuance of our accompanying report. Should you have questions or comments on this report, please contact me on my direct line, (734) 604-3613 or via email at dbeauchamp@avomeen.com.

A handwritten signature in black ink, appearing to read "Derek", written over a horizontal line.

Derek A. Beauchamp, Ph.D.
Technical Director

12/22/14
Date